**Remarks/Arguments:**

This is a reply to the office action of August 1, 2006, in which claims 1 - 57 were rejected over prior art. The rejections are respectfully traversed for reasons set out below, with reference to two attached marked-up drawings.

1. According to the Examiner (office action page 3 regarding claim 1, lines 14-16) "...said bridge (Figure 2 of Dang's patent reference 50) connects two faced outer lobes of two adjacent lines ...". [Emphasis added.] Therefore we can consider the lobe connected with the bridge 50 an outer lobe (see the enclosed Fig. 2 of the Dang's patent where a module is highlighted and the distance between the outer lobes and inner lobes are indicated).

2. Consequently, if the first outer lobe is connected to the bridge the following two lobes encountered running along the line path are an inner lobe and an outer lobe (see office action, page 2 regarding claim 1, lines 7-12).

3. The present application's description at paragraph [0019] and [0020] defines the terms "apex" and "distance between apex": apex = the point farthest from the axis of a line; distance = straight line perpendicular to two parallel lines tangential the apex. Actually, claim 1 states that "each lobe comprising one or more curved sections having concavities facing the same direction, defining an apex (see "apex" definition) of the lobe".

4. Claim 1 recites that "for each module, the distance (see "distance" definition) between the apex of one of the outer lobes and the apex of the inner lobe [d1 of figure 2 in Venturelli's application] of the same module is less than the distance between the apex of the same outer lobe and the apex of any outer lobe of an adjoining module [D2 or D3]". Therefore d1<D2 and d1<D3.

5. In contrast, Dang Fig.2 shows that for all the modules (as defined by the Examiner or any other module) the distance between the apex of one of the outer lobes and the apex of the inner lobe [D(O1-I) or D(O2-I)] of the same module is greater than the distance between the apex of the same outer lobe and the apex of any outer lobe of an adjoining module [D[O1-O4) or D(O1-O3) or D(O2-O4) or D(O2-O3)]. Therefore D(O1-I)=D(O1-O4) and D(O1-I)>D(O1-O3) and D(O2-I)=D(O2-O4) and D(O2-I)> D(O2-O3). Even if we consider the inner edge of the selected outer lobe, Dang shows that D'(O1-I)>D'(O1-O3) and D'(O1-I)=D'(O1-O4).

Dang fails to show one of the important limitations of claim 1. The module defined by claim 1 presents an M shape where the outer lobes are the lobes extending in the longest arms. With this module definition, Dang's bridges are connected to the inner lobes and Venturelli's bridges are connected exclusively to outer lobes.

For the foregoing reasons, we respectfully submit that claim 1 is novel over Dang and that, moreover, claim 1 is not obvious from the references, none of which discloses or suggests that "the distance between the apex of one of the outer lobes and the apex of the inner lobe of the same module be less than the distance between the apex of the same outer lobe and the apex of any outer lobe of an adjoining module". Claims 2 - 56 depend from claim 1 and deemed allowable for the subject matter they incorporate, in combination with the additional features expressly recited.

Claim 57 is also deemed novel over Dang in that it recites "all of the lobes of the series of lobes opening alternately on opposite sides of the pathway of the pattern". In Dang, the lobes do not open alternately on opposite sides: a pair of lobes opens to one side, the next pair opens to the other side, and so on.

Respectfully submitted,

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